



May 29, 2025

By ECF and Email

The Honorable Robert W. Lehrburger
United States Magistrate Judge
United States District Court
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Avalon Holdings Corp. v. Gentile*, No. 18-cv-7291 (VSB) (RJL); *New Concept Energy, Inc. v. Gentile*, No. 18-cv-8896 (VSB) (RJL)

Dear Judge Lehrburger:

We write pursuant to the Court's Order of May 22, 2025, compelling our firm to respond to Interrogatory #21, which asks "Has the Firm or any of its partners (including either or both of Adam Ford and/or Matthew Ford, individually) been paid for representing Guy Gentile in either of the cases brought by the Judgment Creditors."

FOBL, Adam Ford and Matthew Ford respond by stating that all payments made on behalf of Mr. Gentile were paid directly to the law firm of Ford O'Brien Landy, LLP. FOBL received payment from the following accounts which—in part—went towards payment for representation in the cases brought by the Judgment Creditors.

[REDACTED]

[REDACTED]

[REDACTED]

Having disclosed the full information regarding the banks from which the firm received funds related to Mr. Gentile, FOBL is no longer withholding any information on the basis of attorney client privilege and as such has no privilege log to produce. Having provided this bank account information, FOBL asserts that a deposition of either Adam or Matthew Ford would not

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reveal any additional information responsive to Plaintiffs' interrogatories and respectfully requests that no depositions be ordered.

Respectfully submitted,

/s/ Adam Ford
Adam Ford